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*Attorneys for Defendant  
Time Warner Cable Inc.*

HAROLD M. HOFFMAN, individually and on behalf of those similarly situated,

Plaintiff,

vs.

TIME WARNER CABLE INC.,

Defendant.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

Civil Action: 2:12-cv-978-ES-SCM

**PROPOSED SCHEDULING ORDER**

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**THIS MATTER** having been opened to the Court on Plaintiff's application for additional time to conduct class discovery in this case, and the Court having considered the submission of counsel, and for good cause shown,

**IT IS**, on this \_\_\_\_\_ day of \_\_\_\_\_,

**ORDERED** that the following class discovery schedule shall apply in this case, unless modified by further Order of the Court:

1. Class discovery will be stayed for 90 days from the date of this Scheduling Order.

2. Written discovery relating to class issues will be served by each party by \_\_\_\_\_.

3. The parties will respond to the written discovery in accordance with the Federal Rules of Civil Procedure.

4. If any issue arises regarding written class discovery, the parties will attempt to resolve their disagreement and, if unable to do so, will contact the court to resolve the issue.

5. The parties will then proceed with depositions relating to class issues and conclude class discovery by \_\_\_\_\_.

6. The parties will submit a joint letter (no more than 5 pages) itemizing the issues to be discussed at the next court conference by July 11, 2013.

7. The parties will appear before Magistrate Judge Mannion for a status conference in Newark-Courtroom 4A on July 18, 2013 at 10:30 am.

**IT IS SO ORDERED.**

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Hon. Steven C. Mannion, U.S.M.J.

Dated: